

REMARKS/ARGUMENTS

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the amendments and remarks herewith. The present amendment is being made to facilitate prosecution of the application.

I. STATUS OF THE CLAIMS AND FORMAL MATTERS

Claims 9-15 are pending. Claims 9, 11 and 13 are independent and hereby amended. No new matter has been added. It is submitted that these claims, as originally presented, were in full compliance with the requirements of 35 U.S.C. §112. Changes to claims are not made for the purpose of patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112. Rather, these changes are made simply for clarification and to round out the scope of protection to which Applicants are entitled.

II. SUPPORT FOR AMENDMENT IN SPECIFICATION

Support for this amendment is provided throughout the Specification as originally filed and specifically at paragraph [0046] of Applicants' corresponding published application. By way of example and not limitation:

[0009] If the host machine does not store the reproduction program data and execution program data, the memory device may store a program for automatically or manually installing the reproduction program data and execution program data in the host machine. In this case, in response to that the terminal of the memory device is connected to the host machine, the install program can be executed to install the reproduction program and execution program. At a result, even an apparatus other than the host machine can reproduce image data and the like

stored in the memory device by using the reproduction program and execution program.

[0046] Further, according to the embodiment, for example, if a user wishes to reproduce and view image data and the like stored in the memory device 10 on a second PC (not shown) different from PC 1, the second PC can execute the following processing. For example, as a user connects the memory device 10 to a USB interface possessed by the second PC, the second PC searches a driver for operating the memory device 10 through plug-and-play. Since the second PC does not have the driver, it is recommended to install an optimum driver. The user operates the second PC to install the driver 19 stored in the memory device 10 and install the reproduction program 16 and automatic activation program 17 in the second PC. This installation can be performed by using the install program 20 stored in the memory device 10. Alternatively, if the second PC does not have the driver, it may access the memory device and automatically install an optimum driver (driver 19) by using the install program 20. Thereafter, by merely connecting again the memory device 10 to the USB Interface, the reproduction program can be automatically activated by the automatic activation program 17 and image data and the like can be reproduced.

III. RESPONSE TO REJECTIONS UNDER 35 U.S.C. §103(a)

Claims 9-11 and 13 were rejected under 35 U.S.C. §103(a) as allegedly unpatentable over U.S. 2001/0041021 to Boyle (hereinafter, merely “Boyle”) in view of U.S. Patent No. 5,633,678 to Parulski et al. (hereinafter, merely “Parulski”) and U.S. Patent No. 6,704,824 to Goodman (hereinafter, merely “Goodman”).

Claim 12 was rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Boyle, Goodman and Parulski in view of Applecare Document: 122014.

Claim 14 was rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Boyle, Goodman and Parulski in view of US 2004/0004737 to Kahn (hereinafter, merely “Kahn”).

Claims 15 was rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Boyle, Goodman and Parulski in view of US 2003/0076365 to Sese (hereinafter, merely "Sese").

Claim 9 recites, *inter alia*:

...wherein, **when the host machine does not store the reproduction program data, the execution program data and the driver program data**, the install program data automatically installs the reproduction program data, the execution program data and the driver program data on the host machine in response to connecting the portable memory device to the host machine...
(Emphasis added)

As understood by Applicants, Goodman relates to an automatic installation of a communication adapter for a computer.

Applicants submit that neither Boyle nor Parulski nor Goodman, taken alone or in combination, would disclose or render predictable the above-identified features of claim 9. Specifically, neither of the references used as a basis for rejection discloses or renders predictable "**when the host machine does not store the reproduction program data, the execution program data and the driver program data**, the install program data automatically installs the reproduction program data, the execution program data and the driver program data on the host machine in response to connecting the portable memory device to the host machine," as recited in claim 9.

Specifically, the Office Action (page 4) asserts that Boyle teaches installing the software program for the hotsync program, and refers to Boyle, paragraphs [0010], and [0036]. Thus, Boyle, paragraphs [0010], [0036] and Figs. 1-3 are reproduced as follow:

[0010] In a preferred embodiment, the conduit of the present invention is a software program that is installed into the standard "HotSync" manager of the PC, providing seamless synchronization between the PDA and the PC without the need for user interaction. Other advantages, features and embodiments of the present invention will be apparent from the drawings and detailed description as set forth below.

[0036] Once the desired images have been captured, the handheld electronic device 120 is connected to the computing device 110 utilizing the I/O device 122 in step 618. Then, in step 620, the sync manager 230 runs the imaging conduit 310 along with any other conduits to synchronize the handheld electronic device 120 and the computing device 110. The functionality of the imaging conduit 310 is discussed below in conjunction with FIG. 7. Although the above discussion describes transferring images from the handheld electronic device 120 to the computing device 110, a bi-directional synchronization of images, including uploading images from the computing device 110 to the handheld electronic device 120, is within the scope of the present invention.

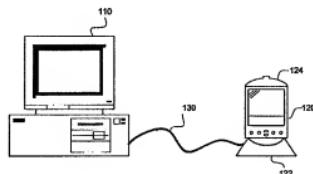


Fig. 1

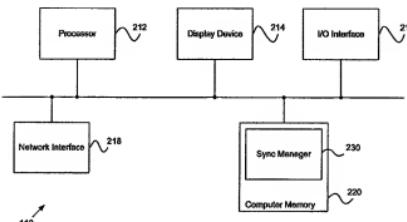


Fig. 2

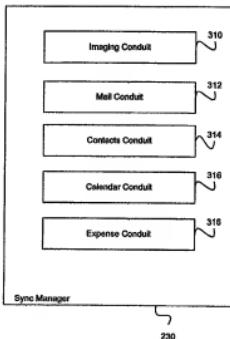


Fig. 3

Applicants submit that Boyle describes that when the handheld electronic device 120 is connected to the computing device 110, the sync manager 230 runs the imaging conduit 310 to synchronize the handheld electronic device 120 and the computing device 110. However, in Boyle, Fig 3 shows that imaging conduit 310 is contained in sync manager 230, and Figs. 1-2 show that sync manager 230 is stored in computer memory 220, which is included in the computer device 110. In other words, when the handheld electronic device 120 is connected to the computing device 110, the imaging conduit 310 is already stored in the computer device 110. Thus, Boyle fails to disclose or render predictable “**when the host machine does not store the reproduction program data, the execution program data and the driver program data, the install program data automatically installs the reproduction program data, the execution program data and the driver program data on the host machine in response to connecting the portable memory device to the host machine,**” as recited in claim 9.

Furthermore, this deficiency of Boyle is not cured by the supplemental teaching of Goodman or Parulski.

Therefore, Applicants submit that independent claim 9 is patentable and respectfully request reconsideration and withdrawal of the rejection.

For reasons similar to, or somewhat similar to, those described above with regard to independent claim 9, independent claims 11 and 13 are also patentable, and Applicants thus respectfully request reconsideration of the rejections thereto.

IV. DEPENDENT CLAIMS

The other claims in this application are each dependent from one of the independent claims discussed above and are therefore believed patentable for at least the same reasons. Applicants thereby respectfully request reconsideration and withdrawal of rejections thereto. Because each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

CONCLUSION

Because Applicants maintain that all claims are allowable for at least the reasons presented hereinabove, in the interests of brevity, this response does not comment on each and every comment made by the Examiner in the Office Action. This should not be taken as acquiescence of the substance of those comments, and Applicants reserve the right to address such comments.

In the event the Examiner disagrees with any of statements appearing above with respect to the disclosure in the cited reference, or references, it is respectfully requested that the Examiner specifically indicate those portions of the reference, or references, providing the basis for a contrary view.

Please charge any additional fees that may be needed, and credit any overpayment, to our Deposit Account No. 50-0320.

In view of the foregoing amendments and remarks, it is believed that all of the claims in this application are patentable and Applicants respectfully request early passage to issue of the present application.

Respectfully submitted,

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